

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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	:	
In re:	:	Chapter 11
	:	
VIRGIN ORBIT HOLDINGS, INC., <i>et al.</i> , ¹	:	Case No. 23-10405 (KBO)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	Ref. Docket Nos. 96, 459, 532, 542, 559,
	:	571, 576, 589, 595 & 596
	X	

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER CONFIRMING
THE FIFTH AMENDED JOINT CHAPTER 11 PLAN OF VIRGIN ORBIT
HOLDINGS, INC. AND ITS DEBTOR AFFILIATES**

On June 28, 2023, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Notice of Filing of Revised Proposed Order Confirming the Fourth Amended Joint Chapter 11 Plan of Virgin Orbit Holdings, Inc. and Its Debtor Affiliates* [Docket No. 589] (the “**Proposed Confirmation Order**”) in advance of a hearing (the “**Confirmation Hearing**”) held on the same day to consider approval of the *Fourth Amended Joint Chapter 11 Plan of Virgin Orbit Holdings, Inc. and Its Debtor Affiliates* [Docket No. 588] (as amended, modified, revised, and supplemented, the “**Plan**”).

At the Hearing, the United States Bankruptcy Court for the District of Delaware (the “**Court**”) indicated that it would enter the Proposed Confirmation Order provided that the Debtors made certain revisions to the Proposed Confirmation Order consistent with the Court’s ruling on the record of the Hearing. Accordingly, the Debtors revised the Proposed Confirmation Order, attached hereto as **Exhibit A** (the “**Revised Proposed Confirmation Order**”), to reflect

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number, are: Virgin Orbit Holdings, Inc. (6914); Virgin Orbit National Systems, LLC (3801); Vieco USA, Inc. (0492); Virgin Orbit, LLC (9648); and JACM Holdings, Inc. (1445). The Debtors’ mailing address for purposes of these cases is 3880 McGowen Street, Long Beach, CA 90808.

the Court's rulings and comments made on the record at the Hearing. For the convenience of the Court and interested parties, attached hereto as **Exhibit B** is a blackline comparing the Proposed Confirmation Order to the Revised Proposed Confirmation Order. The Debtors have circulated the Revised Proposed Confirmation Order to the Office of the United States Trustee for the District of Delaware, counsel for the Official Committee of Unsecured Creditors, and the Debtors' lenders, and such parties have informed the Debtors that they do not object to entry of the Revised Proposed Confirmation Order.

The Debtors respectfully submit that the Revised Proposed Confirmation Order is consistent with the Court's rulings and comments at the Hearing and entry of the Revised Proposed Confirmation Order is in the best interest of the Debtors and their estates. Accordingly, the Debtors respectfully request that the Court enter the Revised Proposed Confirmation Order at its earliest convenience without further notice or hearing.

[Signature page follows]

Dated: July 31, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

Robert Brady (No. 2847)
Michael R. Nestor (No. 3526)
Kara Hammond Coyle (No. 4410)
Allison S. Mielke (No. 5934)
Rodney Square, 1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: rbrady@ycst.com
mnestor@ycst.com
kcoyle@ycst.com
amielke@ycst.com

-and-

LATHAM & WATKINS LLP

Jeffrey E. Bjork (admitted *pro hac vice*)
355 South Grand Avenue, Suite 100
Los Angeles, California 90071
Telephone: (213) 485-1234
Facsimile: (213) 891-8763
Email: jeff.bjork@lw.com

George Klidonas (admitted *pro hac vice*)
Anupama Yerramalli (admitted *pro hac vice*)
Liza L. Burton (admitted *pro hac vice*)
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Emails: george.klidonas@lw.com
anu.yerramalli@lw.com
liza.burton@lw.com

Counsel for Debtors and Debtors in Possession